

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

CIVIL ACTION NO. 05-10216JLT

CARLOS PINEDA and
ALEXANDRA PEREZ,
Plaintiffs,

v.

DANIEL KEELER, DENNIS
HARRIS, JOSPEH R. WATTS,
JOSEPH P. TOOMEY, WILLIAM
J. GALLAGHER, EDWARD
GATELY, JANINE BUSBY, and
the CITY OF BOSTON
Defendants

JOINT STATEMENT OF THE PARTIES

Pursuant to the Court's Notice of Scheduling Conference and Rule 16.1(D) of the Local Rules of the United States District Court for the District of Massachusetts, counsel for the above- named parties have conferred and propose the following pretrial schedule:

1. **Joint Discovery Plan and Motion Schedule:**

The parties propose the following pre-trial schedule:

- (a) All depositions are to be completed by June 30, 2006, except for expert witnesses;
- (b) The plaintiffs' expert witnesses shall be designated by July 31, 2006 and defendants' expert witnesses shall be designated within 30 days after plaintiff discloses said expert(s) as contemplated by Fed. R. Civ. P. 26(b)(4)(A); designation of experts shall include provision of any information required by the Federal Rules of Civil Procedure and/or the Local Rules of the District of Massachusetts; any expert depositions shall be completed within 30 days of defendants' expert designation;
- (c) All dispositive motions are to be filed by October 31, 2006, and responses are to be filed fourteen days thereafter pursuant to Local Rule 7.1;

- (d) The plaintiff shall name other parties, if any, not later than June 15, 2006;
 - (e) A final pre-trial conference will be held per order of the Court.
- 2. Defendants intend to take no more than 10 depositions during the discovery period, in conformity with Fed.R.Civ.P. 30(a)(2)(A) and LR, D.Mass. 26.1(C). Plaintiff intends to take no more than 10 depositions during the discovery period, in conformity with Fed.R.Civ.P. 30(a)(2)(A) and LR, D.Mass. 26.1(C).
 - 3. Certifications regarding each parties' consultation with counsel regarding budgets and alternative dispute resolution will be filed separately.

Respectfully submitted,

PLAINTIFFS
CARLOS PINEDA and ALEXANDRA
PEREZ,

DEFENDANTS
DANIEL KEELER, DENNIS HARRIS,
JOSEPH R. WATTS, JOSEPH P. TOOMEY,
WILLIAMS J. GALLAGHER, EDWARD
GATELY, AND JANINE BUSBY
Merita A. Hopkins
Corporation Counsel

By their attorney,

By their attorney:

/s/ Stephen Hrones

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